

REMARKS

Claims 2, 8, 10, 16, 18, and 24 have been amended. Claims 44-67 are withdrawn. Claims 2-43 are currently pending in the application.

The Examiner rejected claims 2-3, 5, 7-11, 13, 15-19, 21, and 23-43 under 35 U.S.C. § 102(b) as being anticipated by Judice (USPN 3,937,878). The Examiner objected to claims 4, 6, 12, 14, 20, and 22. Applicant respectfully traverses the rejection and objection and requests reconsideration of the application.

In order for a reference to anticipate an invention, each and every element of the claimed invention must be found in a single reference. "Moreover, it is incumbent upon the examiner to identify wherein each and every facet of the claimed invention is disclosed in the applied reference." Ex parte Levy, 17 USPQ2d 1461, 1462 (Bd Pat App & Inter 1990). Applicant respectfully submits that Judice does not anticipate Applicant's claimed invention because Judice does not teach or disclose each and every element of the claimed invention.

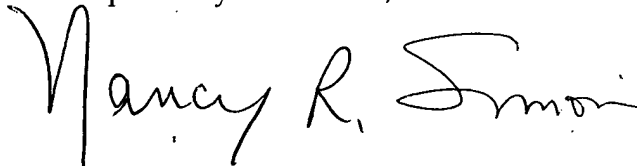
Judice uses a single dither matrix with the same dither threshold values to halftone an image. Every pixel in the image is assigned a corresponding dither threshold value from the dither matrix, and that same dither threshold value is used when the pixel is first halftoned and during any subsequent "conditional replenishment" halftoning (see col. 2, line 60 to col. 3, line 2; col. 3, line 63 to col. 4, line 8; and col. 4, line 42 to col. 5, line 8)). The Examiner argues this "conditional replenishment" discloses different halftone parameters, in that the selection parameter for the first technique is "all pixels" and the selection parameter for the second technique is "all pixels that differ from the corresponding pixel of a previous frame."

Unlike Judice, Applicant's independent claims 1, 10, and 18 each recite, in relevant part, "halftoning an input image *comprised of a plurality of pixels*" and "halftoning the input image by applying one of at least two halftone techniques *to the plurality of pixels in the input image*." Judice does not teach or suggest this aspect of the claimed invention. Applicant therefore submits claims 1, 10, and 18 are not anticipated by Judice.

"Claims in dependent form shall be construed to incorporate by reference all the limitations of the claim incorporated by reference into the dependent claim." 37 CFR 1.75. Claims 3, 5, 7-9, and 26-31 depend from and include all the limitations of claims 2, claims 11, 13, 15-17, and 32-37 depend from and include all of the limitations of claim 10, and claims 19, 21, 23-25, and 38-42 depend from and include all of the limitations of claim 18. For at least the reasons discussed above, Judice does not anticipate independent claims 2, 10, and 18. Accordingly, dependent claims 3, 5, 7-9, 11, 13, 15-17, 19, 21, 23-43 are also not anticipated by Judice.

In light of the discussion above, Applicant believes that all claims currently remaining in the application are allowable and respectfully requests allowance of such claims.

Respectfully submitted,

A handwritten signature in black ink that reads "Nancy R. Simon". The signature is fluid and cursive, with the first name "Nancy" being the most prominent part.

Nancy R. Simon

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